

Hearing Date and Time: June 26, 2007 at 10:00 a.m.  
Response Date and Time: June 19, 2007 at 4:00 p.m.

Elena Lazarou (EL-5681)  
Reed Smith LLP  
559 Lexington Avenue  
New York, New York 10022  
Telephone: 212-521-5400  
Facsimile: 212-521-5450

-and-

Stephen T. Bobo  
Reed Smith LLP  
10 South Wacker Drive, 40<sup>th</sup> Floor  
Chicago, IL 60606  
Telephone: 312-207-1000  
Facsimile: 312-207-6400

Attorneys for Johnson Controls, Inc.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re	:	
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Chapter 11
	:	
Debtors.	:	Case No. 05-44481 (RDD)
	:	
	:	(Jointly Administered)
	:	
-----X		

**RESPONSE OF JOHNSON CONTROLS, INC. (CLAIM NO. 15523) TO DEBTORS'**  
**FIFTEENTH OMNIBUS OBJECTION (SUBSTANTIVE) PURSUANT TO 11 U.S.C. §**  
**502 (b) AND FED. R. BANKR. P. 3007 TO CERTAIN (A) INSUFFICIENTLY**  
**DOCUMENTED CLAIMS, (B) CLAIMS NOT REFLECTED ON DEBTORS' BOOKS**  
**AND RECORDS, (C) UNTIMELY CLAIMS AND UNTIMELY TAX CLAIMS, AND (D)**  
**CLAIMS SUBJECT TO MODIFICATION, AND MODIFIED CLAIMS ASSERTING**  
**RECLAMATION**

Johnson Controls, Inc. ("JCI") responds to the objection of Delphi Corporation and its debtor affiliates (collectively, the "Debtors") concerning claim number 15523 that JCI filed against Delphi Automotive Systems LLC as an unliquidated secured claim as follows:

1. Claim number 15523 is based on the extensive commercial dealings between JCI's Automotive Group and the Debtors. JCI has numerous prepetition purchase orders outstanding under which it purchases various automotive parts from various business units and divisions of the Debtors. JCI filed claim number 15523 as including a contingent and unliquidated component to reflect potential claims that JCI may have arising under those purchase orders. Most of the purchase orders are on a directed supply basis and the Original Equipment Manufacturers may later raise pricing adjustments or warranty items with JCI that JCI would in turn be entitled to assert as claims against the Debtors. Claim number 15523 also includes the liquidated amount of \$1,305.00 that Delphi Automotive Systems LLC acknowledges owing to JCI.
2. Claim number 15523 was filed as a secured claim in order to preserve JCI's setoff rights as they existed on the petition date of the Debtor's chapter 11 cases.
3. The Debtors seek to modify claim number 15523 to have it allowed as an unsecured claim in the amount of \$1,305.00. JCI objects to such proposed modification. JCI reserves the right to amend claim number 15523 to provide the details and damage amount of any contractual breaches by the Debtors or any price adjustments under those contracts.
4. In the circumstances, the objection seeking a modification to claim number 15523 should be overruled pending JCI's amendment of the claim. The person authorized to reconcile and resolve this claim is Stephen T. Bobo, Reed Smith Sachnoff & Weaver, 10 South Wacker Drive, 40<sup>th</sup> Floor, Chicago, IL 60606, (312) 207-6480.

Dated: June 19, 2007

RESPECTFULLY SUBMITTED

Johnson Controls, Inc.

By: /s/ Elena Lazarou

REED SMITH LLP  
599 Lexington Avenue  
New York, NY 10022  
Telephone: 212-521-5400  
Facsimile: 212-521-5450

Of Counsel

Stephen T. Bobo  
REED SMITH LLP  
10 South Wacker Drive  
40<sup>th</sup> Floor  
Chicago, IL 60606  
Telephone: 312-207-1000  
Facsimile: 312-207-6400